

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the Matter of:

United States of America

v.

Mark A. GREEN

12380 Clay Pike Road

Senecaville, OH 43780

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Case No.: 2:23-mj-290

Magistrate Judge

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Bianca Ragone, a Special Agent with Homeland Security Investigations, being duly sworn, hereby depose and state:

1. I, Special Agent Bianca Ragone (your affiant), make this affidavit in support of a criminal complaint to arrest for violations of Title 18 United States §§ 2251, 2252, and 2252A– the sexual exploitation of a minor and the distribution, receipt, and possession of child pornography. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. The statements contained in this affidavit are based in part on information and analysis provided by law enforcement agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from the service of subpoenas and execution of search warrants; interview(s); and my experience, training and background as a Special Agent. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Mark A. GREEN (GREEN) committed the violations listed above.
2. I am a Special Agent (SA) of Homeland Security Investigations (HSI), assigned to the Office of the Assistant Special Agent in Charge, Columbus, Ohio since September 2019. During my tenure as a Special Agent, I have completed the Criminal Investigator Training Program (CITP) and the Homeland Security Investigations Special Agent Training Program (HSISAT) at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. During CITP and HSISAT I have received training that included cybercrimes, child pornography, and the dark web. I am currently based out of the Guernsey County Sheriff's Office (GCSO), and I am responsible for enforcing federal law in numerous eastern counties in the Southern District of Ohio. Prior to that I was assigned to the Franklin County Internet Crimes Against Children (ICAC) Task Force investigating child exploitation offenses between November 2019 and February of 2022. Prior to that, I worked for the Federal Bureau of Investigation for three years as a Student Work Force Trainee on a Violent Crimes Task Force working child exploitation cases. Moreover, I am

a federal law enforcement officer who is engaged in enforcing federal criminal laws, including 18 U.S.C. §§ 2251, 2252, and 2252A, and I am authorized by law to request a criminal complaint.

FACTS SUPPORTING PROBABLE CAUSE

3. On June 6, 2022, the Circleville Police Department in Circleville, Ohio contacted Homeland Security Investigations regarding the distribution of child sexual abuse material. More specifically, CPD reported that they had downloaded child pornography files from a digital media device using an Internet Protocol (IP) address that came back to a residence located at 12380 Clay Pike Road Senecaville, Ohio. This download had been completed via Peer to Peer (P2P) file sharing which allows people using P2P software to download and share files with other P2P users using the same or compatible P2P software.
4. Your affiant knows that P2P software is readily available on the Internet and often free to download and allows user on the network to share digital files. An example of one such P2P network is BitTorrent. Users of the BitTorrent network wishing to share new content use a BitTorrent program to create a “torrent” file for the file or group of files they wish to share. A torrent file is a small file that contains information about the file(s) and provides a method for a user to download the file(s) referenced in the torrent from other BitTorrent users. Torrent files may be referenced by their “infohash”, which uniquely identifies the torrent based on the file(s) associated with the torrent file. The BitTorrent software processes the information in the torrent file and locates devices on the BitTorrent network sharing all or parts of the actual file(s) being sought. The download of the content referenced in the torrent is achieved after the requesting computer and the sharing computer(s) directly connect to each other through the Internet using the BitTorrent software.
5. On or about October 17, 2021, CPD was conducting an online investigation on the BitTorrent network for offenders sharing child pornography. An investigation with CPD was initiated for a device attributed to IP address 192.182.161.55. In beginning their investigation, CPD had knowledge that a torrent with “c153780bb14c065aec25de3f50ed23ca2de358cc” as the specific info hash contained at least one identified file of investigative interest, specifically because that file had been identified as containing child pornography. Between approximately October 17 and October 18, 2021, a download by CPD was successfully completed of 49 file(s) that the device registered to IP address 192.182.161.55 was making available.
6. In addition, between approximately October 22 and October 25, 2021, CPD successfully completed another download of 69 file(s) from the BitTorrent network again which was made available again from the device registered to IP address 192.182.161.55.
7. Preliminary investigation revealed that the Internet Service Provider (ISP) owning/operating IP address 192.182.161.55 was Frontier Communications. On November 12, 2021, a subpoena was served to Frontier Communications requesting subscriber

information related to the above-mentioned IP address. On November 18, 2021, Frontier Communications responded with the following subscriber information:

Customer Name: Mark Green
Account Address: 12380 Clay Pike Road Senecaville, OH 43780
Billing Address: Same
Billing Number: 740-685-2890
Length of Service: 9/12/2015 to present
Type of Service: Residential internet
Email Address: handyman1368@frontier.com

8. While the investigation into Mark Green from Senecaville, Ohio began preliminarily, Circleville Police continued to engage in their online child exploitation investigation generally via BitTorrent. On or about September 3, 2022, another download was successfully completed of 5 file(s) that a device registered to IP address 104.169.91.101 had made available.
9. On September 6, 2022, law enforcement learned that the Internet Service Provider (ISP) owning/operating IP address 104.169.91.101 was Frontier Communications. On or about September 8, 2022, a subpoena was served to Frontier Communications requesting subscriber information related to the above-mentioned IP address. On September 12, 2022, Frontier Communications responded with the same subscriber information noted above as received from the original November 12, 2021, subpoena related to IP address 192.182.161.55: Mark Green at 12380 Clay Pike Road in Senecaville, Ohio.
10. On or about October 6, 2022, your affiant reviewed all case documents and suspected child sexual abuse files downloaded by CPD from devices attributed to IP addresses which were registered to Mark Green. More specifically, your affiant determined that 12 files from the October 17, 2021, downloads, 12 files from the October 22, 2021, downloads, and 3 files from the September 3, 2022, downloads depicted child pornography. Most of the files depicted prepubescent females either posed for a lascivious exhibition of their genitalia, masturbating, and/or an adult male engaged in a sex act with the minor female.
11. For example, one of the files from the CPD download occurring on or about October 22, 2021, was titled "3e.avi" and depicted an approximately 1 minute and 6 second video in which an adult male is observed inserting his penis into the anus of a nude toddler female. Additionally, a file from the CPD download occurring on or about September 3, 2022 titled "(_pthc center_)(opva)(2013)Nice 11yo Fucks_Masturbates_Beautiful.mpg" depicted an approximately 1 minute and 27 seconds video in which a prepubescent boy, approximately 8 years of age, is observed with his nude genital area rubbing against the vagina of a nude prepubescent female, approximately 11 years of age. The video then cuts to that same prepubescent female depicted nude and masturbating using an object.

12. Further investigation via law enforcement and open-source databases revealed GREEN had registered his address as 12380 Clay Pike Road in Senecaville, Ohio which had been listed as his residence since 2016.
13. On March 29, 2023, a search warrant for the residence of Mark GREEN was obtained from the Guernsey County Municipal Court. On or about March 30, 2023, that search warrant was executed by the Guernsey County Sheriff's Office in conjunction with HSI.
14. During the execution of the search warrant, approximately 30 digital media devices were recovered from the residence. Law enforcement conducted on scene forensics on some of the devices recovered, including a black 256GB USB drive that was connected to a Blink security camera. Review of that USB revealed numerous videos which depicted Minor Victim One, an approximately 14-year-old female, nude. The videos appeared to have been taken surreptitiously, with the angle of the camera indicating it had been hidden in a bathroom both GREEN and Jane Doe #1 had access too. For example, one video in particular, titled 16-07-01_G8TDB_024, depicted Minor Victim One completely nude exposing her breasts and vagina. Minor Victim One was in the bathtub taking a bath laying on her back while using a razor to shave her vagina and pubic region. The metadata associated to that video indicated that it was created on or about February 27, 2022, making Minor Victim one approximately 14 years of age at the time.
15. That same day, GREEN was transported to the Guernsey County Sheriff's Office. After receiving hid *Miranda* warnings, GREEN waived and agreed to speak to law enforcement. During that conversation, GREEN admitted to using P2P software on his laptop and Samsung cellphone to download child pornography, items which were recovered during the search warrant execution for which the forensic review is ongoing. GREEN stated he usually did the downloading of child pornography from his residence and had seen as young as infant child pornography. GREEN admitted that he child pornography that looked age questionable intrigued him, especially the "teen" category. GREEN further admitted to masturbating to the child pornography.
16. In addition, GREEN admitted to installing hidden cameras in numerous locations throughout his residence, specifically the master bedroom and two bathrooms. GREEN states he installed the hidden cameras in hopes it would capture Minor Victim One, a female whom he had access to and who resided in the residence with GREEN, because he was sexually attracted to her. GREEN admitted to masturbating while watching the nude videos he created of Minor Victim One from the hidden cameras he placed in the bedroom and bathrooms. GREEN stated he would either watch the recording live or watch the video on playback through the Blink camera mobile application.
17. Approximately 60 total devices were seized in the investigation of GREEN. On or about April 1, 2023, your affiant began the review of the forensic evidence from the Blink cameras recovered from GREEN's residence which GREEN also described in his interview. In that review, your affiant noted GREEN had saved a video, titled 16-39-30_G8TDB_007, which depicted Minor Victim Two, an approximately 16-year-old male, sitting on a toilet in the bathroom and masturbating with his nude penis exposed. Metadata associated to this video indicated that it had been created on or about November


6, 2021, when Minor Victim Two would have been approximately 16-years of age. Your affiant also learned that Minor Victim Two resided in the home and that GREEN had consistent access to Minor Victim Two. The video also appeared to be taken with a hidden camera placed above Minor Victim Two in the bathroom of the residence.

18. Additionally, a video titled 21-51-21_G8TDB_008, was noted during the review of the Blink camera forensics which depicted Minor Victim One completely nude and engaged in acts of masturbation while in the bathroom. Metadata associated with this video indicated that it had been created on or about December 3, 2021, making Minor Victim One approximately 14-years-old at the time. The video also appeared to be taken with a hidden camera placed above Minor Victim One in the bathroom of the residence.
19. Based upon the above information, your affiant submits that there is probable cause to believe that Mark A. GREEN has committed offenses in violation of Title 18 United States §§ 2251, 2252, and 2252A— the sexual exploitation of a minor and the distribution, receipt, and possession of child pornography. Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.



Bianca Ragone
Special Agent
Homeland Security Investigations

Sworn and subscribed to before me this 4th day of May, 2023.



Elizabeth A. Preston Deavers
United States Magistrate Judge

